

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

AFFINITY LABS OF TEXAS, LLC,)
Plaintiff,)
v.) Case No. 1:12-cv-00557-RC
SAMSUNG ELECTRONICS CO., LTD.,) JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS AMERICA, INC.,)
SAMSUNG TELECOMMUNICATIONS)
AMERICA, LLC F/K/A SAMSUNG)
TELECOMMUNICATIONS AMERICA, L.P.,)
HIGH TECH COMPUTER CORP., A/K/A HTC)
CORP., H.T.C. (B.V.I.) CORP., HTC)
AMERICA, INC.; LG ELECTRONICS, INC.,)
LG ELECTRONICS USA, INC., AND LG)
ELECTRONICS MOBILECOMM U.S.A., INC.)
D/B/A LG MOBILE PHONES,)
Defendants.)

**STIPULATION AND AGREED MOTION TO DISMISS WITH PREJUDICE ALL
CLAIMS BETWEEN AFFINITY LABS OF TEXAS, LLC AND THE LG DEFENDANTS**

Pursuant to Federal Rule of Civil Procedure 41(a), Plaintiff Affinity Labs of Texas, LLC (“Affinity”) and Defendants LG Electronics, Inc., LG Electronics USA, Inc., and LG Electronics MobileComm U.S.A., Inc. (collectively, “LG”) hereby agree to and move to dismiss all claims between Affinity and LG in the above-captioned action.

WHEREFORE Affinity and LG hereby respectfully request that this Court:

- i. dismiss with prejudice all claims asserted by Affinity against LG in this action;
- ii. dismiss with prejudice all counterclaims asserted by LG against Affinity in this action; and
- iii. order that costs and attorneys’ fees shall be borne solely by the party incurring the same.

Date: April 15, 2014

By: /s/ John Mulcahy

Frank A. DeCosta, III (pro hac vice)
Email: frank.decosta@finnegan.com
Cecilia Sanabria (pro hac vice)
Email: cecilia.sanabria@finnegan.com
**FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP**
901 New York Ave., NW
Washington, DC 20001-4413
Telephone: 202-408-4000
Facsimile: 202-408-4400

Andy Sonu (pro hac vice)
Email: andy.sonu@finnegan.com
John Mulcahy (VA Bar No. 71305)
(Eastern District of Texas Member)
Email: john.mulcahy@finnegan.com
**FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP**
Two Freedom Square
11955 Freedom Drive
Reston, VA 20190-5675
Telephone: 571-203-2751
Facsimile: 202-408-4400

J. Thad Heartfield
(State Bar No. 09346800)
Email: thad@jth-law.com
M. Dru Montgomery
(State Bar No. 24010800)
Email: dru@jth-law.com
THE HEARTFIELD LAW FIRM
2195 Dowlen Rd
Beaumont, TX 77706
Telephone: 409-866-3318
Facsimile: 409-866-5789

Attorneys for Defendants
LG ELECTRONICS, INC.,
LG ELECTRONICS USA, INC., and
LG ELECTRONICS MOBILECOMM
U.S.A., INC.

Respectfully submitted,

/s/ Charles W. Goehringer, Jr.

Germer PLLC

Lawrence Louis Germer
(TX Bar # 07824000)
Charles W. Goehringer, Jr.
(TX Bar # 00793817)
550 Fannin, Suite 400
P.O. Box 4915
Beaumont, Texas 77701
Telephone: (409) 654-6700
Fax: (409) 835-2115
llgermer@germer.com
cwgoehringer@germer.com

Robins, Kaplan, Miller & Ciresi L.L.P.

Ronald J. Schutz (MN Bar No. 130849)
(Eastern District of Texas Member)
Cyrus A. Morton (MN Bar No. 287325)
(Eastern District of Texas Member)
Daniel R. Burgess (MN Bar No. 389976)
(Eastern District of Texas Member)
Shira T. Shapiro (MN Bar No. 390508)
(*pro hac vice*)
Kristine Tietz (MN Bar No. 393477)
(*pro hac vice*)
800 LaSalle Avenue, Suite 2800
Minneapolis, Minnesota 55402
Telephone: (612) 349-8500
Fax: (612) 339-4181
RJSchutz@rkmc.com
CAMorton@rkmc.com
DRBurgess@rkmc.com
STShapiro@rkmc.com
KATietz@rkmc.com

**Attorneys for Plaintiff Affinity Labs of
Texas, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2014, I caused a true and correct copy of this document (Stipulation and Agreed Motion to Dismiss with Prejudice All Claims and Counterclaims Between Affinity Labs of Texas, LLC and the LG Defendants) to be served on all counsel of record via Electronic Case Filing (ECF) pursuant to Local Rule CV-5(a).

Dated: April 15, 2014

/s/ Charles W. Goehringer, Jr.
Charles W. Goehringer, Jr.